



Order Filed on April 2, 2018
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Gillman & Gillman, LLC
770 Amboy Avenue
Edison, New Jersey 08837
Phone (732) 661-1664
Attorney for Debtors
By: Justin M. Gillman, Esq.

In re:

Brent Morris
Kathleen Morris

Debtor(s).

Chapter: 13

Case No.: 17-30370-MBK

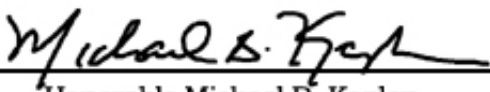
Hearing Date: April 10, 2018

Judge: Hon. Michael B. Kaplan, U.S.B.J.

**CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION OF
BANK OF AMERICA, N.A.**

The relief set forth on the following pages, numbers two (2) through three (3) is hereby
ORDERED.

DATED: April 2, 2018


Honorable Michael B. Kaplan
United States Bankruptcy Judge

This matter having been brought before the Court by Justin Gillman, Esq., Gillman and Gillman, LLC, attorneys for the Debtors, Brent Morris and Kathleen Morris, upon the filing of a Chapter 13 Plan, and Bank of America, N.A., secured creditor, who holds the mortgage on the Debtors' residence located at 1066 Kearney Dr., North Brunswick, NJ 08902, by and through its attorneys, Shapiro & DeNardo, LLC, having filed an Objection to Confirmation of said Chapter 13 Plan; the parties having subsequently resolved the Objection; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and for other and good cause shown:

IT IS HEREBY ORDERED as follows:

1. That Bank of America, N.A. has filed a secured Proof of Claim indicating pre-petition mortgage arrears totaling \$218,520.64 (Claim No. 4-1).
2. That the Trustee is authorized to pay up to \$4,600.00 on the secured arrearage claim of Bank of America in the amount of \$218,520.64 (Claim No. 4-1), so Debtor can apply and potentially complete a Loan Modification. Should the Debtor qualify for a Loan Modification, the Loan Modification must be approved no later than June 30, 2018.
3. If a Loan Modification is approved, Bank of America, N.A., shall file an Amended Proof of Claim showing the amount of arrears paid to date by the Trustee.
4. If the Loan Modification is not approved by June 30, 2018, (or other date extended by Court Order), the Debtor shall do one of the following:
 - a. File a Modified Plan to cure the entire arrearage of Bank of America; or
 - b. File a Modified Plan to surrender the property subject to said claim; or

- c. File a Notice to Convert to Chapter 7; or
- d. File a Notice to dismiss the Chapter 13 case.

5. While pursuing loss mitigation, the Debtor shall make regular post-petition payments to the secured creditor. The Debtor further acknowledges that the monthly post-petition payment amount is subject to change in accordance with the terms of the Note and Mortgage.

6. This Consent Order shall be incorporated in and become part of any Order confirming the Plan in the hearing matter.

We hereby consent to the form, substance and entry of the within order:

/s/ Justin M. Gillman
Justin M. Gillman, Esq.
Gillman & Gillman, LLC
Attorney for Debtors

Dated: 3/27/2018

/s/ Charles G. Wohlrab
Charles G. Wohlrab, Esq.
Shapiro & DeNardo, LLC
Attorneys for Bank of America, N.A.

Dated: 3/20/2018